

UNITED STATES DISTRICT COURT

for the
Eastern District of Texas

FILED: 4/30/20
U.S. DISTRICT COURT
EASTERN DISTRICT COURT
DAVID A. O'TOOLE, CLERK

United States of America
v.

Victor IBARRA (1); Leonel GARDEA (2); Moises
PIEDRA (3); Moises MENDEZ (4)

Case No. 4:20-MJ- 328

SEALED

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 2019 to the present in the county of Collin in the
Eastern District of Texas, the defendant(s) violated:

Code Section

21 U.S.C. Section 846

Offense Description

Conspiracy to possess with the intent to distribute cocaine

This criminal complaint is based on these facts:

See the Affidavit of SA Marcus West DEA attached hereto

☒ Continued on the attached sheet.

Attested to by the applicant in accordance with the
requirements of Fed. R. Crim. P. 4.1 by:

via Webex

(specify reliable electronic means).



Complainant's signature

SA Marcus West DEA

Printed name and title

Date and time issued: 04/30/2020, 4:46 pm

City and State: Sherman, Texas



Christine A. Nowak, U.S. Magistrate Judge